

**UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

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**In Re:
Imerys Talc America, Inc.**

JAMES D. HUFF, Individually and as
Administrator and Administrator ad
Prosequendum of the Estate of **LINDA KAY
HUFF**, Deceased,

Plaintiffs,

v.

ARKEMA, INC. f/k/a PENNWALT
CORPORATION and ELF ATOCHEM
NORTH AMERICA, INC. (sued individually
and as successor-by-merger to WALLACE &
TIERNAN d/b/a WTS PHARMACRAFT);

Case No. 19-01583-KCF

Lead Case No: 19-10289-LSS

Chapter 11

Hearing Date: June 25, 2019

**Judge: Hon. Kathryn C.
Ferguson, Chief Judge**

**STATEMENT PURSUANT TO
FED. R. BANKR. P. 9027(e)(3)**

GSK CONSUMER HEALTH, INC., sued individually and as successor-in-interest to **NOVARTIS CONSUMER HEALTH, INC.;**

PREMIER BRANDS OF AMERICA INC.;

DAVION, INC.;

THORNTON INDUSTRIES, INC.;

JOHN DOE CORPORATIONS 1-50
(fictitious);

AVENTIS INC.;

BARRETT'S MINERALS INC.;

FISONS CORPORATION;

NOVARTIS CORPORATION (sued individually and as successor-in-interest to **CIBA- GEIGY CORPORATION** and its subsidiaries **CIBA CONSUMER PHARMACEUTICALS** and **CIBA SELF-MEDICATION, INC.**);

PFIZER INC.;

SANOFI-AVENTIS U.S. LLC (sued individually and as successor-by-merger to **AVENTIS PHARMACEUTICALS INC.**);

SPECIALTY MINERALS INC. (sued individually and as a subsidiary of **MINERALS TECHNOLOGIES INC.**),

Defendants.

Pursuant to Rule 9027(e)(3) of the Federal Rules of Bankruptcy Procedure, Plaintiff Tawana Floyd, individually and as Administrator and Administrator ad Prosequendum of the Estate of Robert Floyd, Deceased, and as Next Friend of John Doe, a Minor Child, (“Plaintiffs”) and by and through their attorneys, Szaferman Lakind Blumstein & Blader, P.C. and Simon Greenstone Panatier, P.C., state as follows:

1. On May 4, 2019, the Defendants, Johnson & Johnson and Johnson & Johnson Consumer, Inc. (collectively “Johnson & Johnson”) filed a Notice of Removal of an action Plaintiff’s originally filed in the Superior Court of New Jersey, Middlesex County.

2. Plaintiffs were served with Johnson & Johnson’s Notice of Removal on May 6, 2019 by electronic mail.

3. Plaintiffs deny that this proceeding is “core” pursuant to 28 U.S.C. § 157(b) as it relates to Plaintiffs’ claims against Johnson & Johnson.

4. Even if the Court were to determine that Plaintiffs’ claims against Johnson & Johnson are “core,” such claims still require permissive abstention and remand under 28 U.S.C. § 1334(c)(1).

5. Plaintiffs' do not consent to the entry of final orders or judgments by the bankruptcy judge, except for an Order remanding this case to State Court.

Executed on May 23, 2019.

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
Attorneys for Plaintiffs

By: s/ Arnold C. Lakind
Arnold C. Lakind, Esq.